

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Blvd, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant  
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY  
20  
21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652  
24 2950 E. Flamingo Road, Suite L  
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 US BANK NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:21-CV-01454-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and  
plaintiff U.S. Bank, National Association (“U.S. Bank”), by and through their respective attorneys  
of record, which hereby agree and stipulate as follows:

1. On July 26, 2021, U.S. Bank filed its complaint in the Eighth Judicial District  
Court for the State of Nevada;

2. On August 5, 2021, Fidelity removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. Pursuant to FRCP 81(c)(2), Fidelity's response to the complaint is currently due on August 18, 2021;

4. Counsel for Fidelity requests a 30-day extension, through and including Friday, September 17, 2021, for Fidelity to file its response to U.S. Bank's complaint to afford Fidelity's counsel additional time to review and respond to U.S. Bank's complaint.

5. Counsel for U.S. Bank does not oppose the requested extension;

6. This is the first request for an extension made by counsel for Fidelity, which is made in good faith and not for the purposes of delay.

7. This stipulation is entered into without waiving any of Fidelity's objections under Fed. R. Civ. P. 12.

**IT IS SO STIPULATED** that Fidelity's deadline to respond to the complaint is hereby extended through and including Friday, September 17, 2021.

Dated: August 11, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant  
FIDELITY NATIONAL TITLE INSURANCE  
COMPANY

Dated: August 11, 2021

WRIGHT FINLAY & ZAK, LLP

By: /s/-Christina v. Miller  
CHRISTINA V. MILLER  
Attorneys for Plaintiff  
U.S. BANK, NATIONAL ASSOCIATION

**IT IS SO ORDERED.**

Dated August 12, 2021

  
\_\_\_\_\_  
NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE